

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEMETRIUS JOHNSON,)	
)	
<i>Plaintiff,</i>)	Case No. 20-cv-4156
)	
v.)	Judge Sara L. Ellis
)	
REYNALDO GUEVARA, the ESTATE of)	Magistrate Judge Heather K. McShain
ERNEST HALVERSON, DARRYL DALEY,)	
WILLIAM ERICKSON, JOHN HEALY, and)	
the CITY OF CHICAGO)	
)	JURY TRIAL DEMANDED
<i>Defendants.</i>)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ MOTIONS FOR SUMMARY JUDGMENT AND *DAUBERT* MOTIONS**

Plaintiff DEMETRIUS JOHNSON, by his undersigned attorneys, respectfully requests a four-week extension of time to file his response to the Defendants’ motions for summary judgment and *Daubert* motions, stating in support as follows:

1. On April 12, 2024, Defendants filed three separate motions for summary judgment, along with two Daubert motions. Plaintiff’s responses to Defendants’ motions for summary judgment and *Daubert* motions are due May 13, 2024. Dkt. 307.
2. Defendants sought and were granted leave to file motions in excess of the page limits set forth in the Local Rules. Dkt. 322. In total, Defendants’ three summary judgment motions and two *Daubert* motions consist of over 150 pages of briefing.
3. Plaintiff’s counsel has worked diligently to complete a responsive brief, but due to the size and scope of the project and other professional commitments, including other summary

judgment responses due on May 22, 2024, Plaintiff's counsel will be unable to complete Plaintiff's responsive brief by the stated deadline.

4. Plaintiff has consulted with counsel for Defendants Reynaldo Guevara, counsel for Defendants Ernest Halverson, Darryl Daley, William Erickson, and John Healy, and counsel for Defendant City of Chicago, all of whom have kindly agreed to a four-week extension for Plaintiff's completion of the responsive briefs. If the due date for Plaintiff's response is extended, Defendants request the same extension to file their replies, which will then be due on July 19, 2024.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff a four-week extension to June 10, 2024 to file their responsive briefs to Defendants' Motions for Summary Judgement and *Daubert* Motions, and extend Defendants' reply deadlines to July 19, 2024.

RESPECTFULLY SUBMITTED,

/s/ Anand Swaminathan
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CERTIFICATE OF SERVICE

I, Anand Swaminathan, an attorney, certify that on May 8, 2024, I filed the foregoing pleading using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Anand Swaminathan
One of Plaintiff's Attorneys